

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
THE NEW YORK TIMES COMPANY and :  
CAITLIN H. DICKERSON, :  
Plaintiffs, : 19 Civ. 9017 (JLC)  
-against- :  
CUSTOMS AND BORDER PROTECTION, :  
Defendant. :  
----- X

**MOTION TO  
WITHDRAW AS COUNSEL**

**PLEASE TAKE NOTICE** that, with consent of the Defendant, upon the accompanying Declaration of Alexandra Perloff-Giles, Alexandra Perloff-Giles hereby moves to withdraw as counsel for Plaintiff Caitlin H. Dickerson in the above-captioned action. Laura R. Handman of Davis Wright Tremaine LLP has appeared as counsel for Plaintiff Caitlin H. Dickerson and will continue to represent her in this case.

Dated: New York, NY  
December 22, 2020

Respectfully submitted,

By: /s/ Alexandra Perloff-Giles  
Alexandra Perloff-Giles  
Gibson, Dunn & Crutcher LLP  
200 Park Avenue  
New York, NY 10016  
Tel: (212) 351-6307  
Email: aperloff-giles@gibsondunn.com

SO ORDERED:

---

HONORABLE JAMES L. COTT  
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
THE NEW YORK TIMES COMPANY and :  
CAITLIN H. DICKERSON, :  
Plaintiffs, : 19 Civ. 9017 (JLC)  
: :  
-against- :  
: :  
CUSTOMS AND BORDER PROTECTION, :  
: :  
Defendant. :  
: :  
----- X

**DECLARATION OF ALEXANDRA PERLOFF-GILES**

I, Alexandra Perloff-Giles, hereby declare under penalty of perjury that the following is true and correct:

1. I am an attorney at Gibson, Dunn & Crutcher LLP and previously was counsel at The New York Times Company, in which capacity I represented Plaintiffs The Times and Caitlin H. Dickerson in this matter.
2. I make this declaration pursuant to Local Rule 1.4 of the Rules of this Court.
3. As of September 2020, I no longer work at The New York Times. Further, Plaintiff Caitlin H. Dickerson is no longer employed by The Times and will be joining The Atlantic in January of 2021. For both reasons, I am withdrawing as Ms. Dickerson's counsel in this matter.
5. Ms. Dickerson will now be represented by the law firm Davis Wright Tremaine LLP.

6. Attorneys at Davis Wright Tremaine LLP, including Laura R. Handman, appeared in this case on December 22, 2020.
7. My withdrawal will not affect any deadlines or cause any delay in this matter.
8. I am not asserting any retaining or charging lien on my client.

Dated: December 22, 2020  
New York, New York

By: /s/ Alexandra Perloff-Giles  
Alexandra Perloff-Giles  
Gibson, Dunn & Crutcher LLP  
200 Park Avenue  
New York, NY 10016  
Tel: (212) 351-6307  
Email: aperloff-giles@gibsondunn.com

**CERTIFICATE OF SERVICE**

I hereby certify that on December 22, 2020, I caused the foregoing Notice of Motion and Motion to Withdraw Appearance to be served on counsel of record for all parties via the Court's CM/ECF system.

Dated: December 22, 2020  
New York, New York

By: /s/ Alexandra Perloff-Giles  
Alexandra Perloff-Giles  
Gibson, Dunn & Crutcher LLP  
200 Park Avenue  
New York, NY 10016  
Tel: (212) 351-6307  
Email: aperloff-giles@gibsondunn.com